



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

January 7, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Truck Accessories Group, Inc. / MPM 039-18245-00076

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-MOD.dot 9/16/03

January 7, 2004

Mr. Michael Stephenson
Truck Accessories Group, dba 20th Century Fiberglass
1131 D.I. Drive
Elkhart, Indiana

Re: 039-18245
First Minor Permit Modification to
Part 70 No.: T 039-7437-00076

Dear Mr. Stephenson:

Truck Accessories Group, dba 20th Century Fiberglass was issued a Part 70 permit on January 15, 1999 for a stationary fiberglass component manufacturing operation. A letter requesting changes to this permit was received on October 17, 2003. Pursuant to the provisions of 326 IAC 2-7-12(b) a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of incorporating the applicable requirements for the following modification permitted in Minor Source Modification 039-18052-00076:

- (a) Aluminum truck cap customized painting operation with a maximum capacity of 1.25 units per hour. This emission unit is equipped with High Volume Low Pressure (HVLP) spray system, with dry filters to control PM overspray emissions.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for extension (3-4972), or dial (317) 233-4972.

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

APD

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Tony Pelath
Compliance Data Section - Karen Nowak
Administrative and Development

Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Truck Accessories Group, dba 20th Century Fiberglass
1131 D.I. Drive
Elkhart, Indiana 46517**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-7437-00076	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: January 15, 1999
First Administrative Amendment No.: 039-13842, issued on February 22, 2001 First Reopening No.: 039-13207, issued January 16, 2002 Second Administrative Amendment No.: 039-16138, issued on October 17, 2002	
First Minor Permit Modification No.: 039-18245	Pages Affected: 4, 5, 5a, 5b, 29, 30, 31, 32, 33

Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Chief Permit Branch Office Of Air Quality	Issuance Date: January 7, 2004
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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary fiberglass component manufacturing operation.

Responsible Official:	Michael Stephenson
Source Address:	1131 D.I. Drive, Elkhart, Indiana, 46517
Mailing Address:	1131 D.I. Drive, Elkhart, Indiana, 46517
SIC Code:	3089, 3792
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) paint/clear coat booth with one (1) air-assisted airless gun for clear coating and one (1) HVLP gun for painting, and the associated solvent cleaning and coating mixing operations, identified as Paint/Clear Booth # 3, with a maximum capacity of 41.4 pounds of VOC per hour, using dry filters to control particulate matter emissions, exhausting to two (2) stacks, with one (1) cure oven exhausting to one (1) stack.
- (2) One (1) paint/clear coat booth with one (1) air-assisted airless gun for clear coating, and the associated solvent cleaning and coating mixing operations, identified as Paint/Clear Booth # 4, with a maximum capacity of 41.4 pounds of VOC per hour, using dry filters to control particulate matter emissions, exhausting to one (1) stack, with one (1) cure oven exhausting to one (1) stack.
- (3) Two (2) spray booths identified as Spray Booth # 1 and Spray Booth # 2 each equipped with one (1) HVLP spray gun for painting, and the associated solvent cleaning and coating mixing operations, each with a maximum capacity 41.4 pounds of VOC per hour, each using dry filters to control particulate matter emissions and each exhausting to one (1) stack.
- (4) One (1) chop booth equipped with one (1) non-atomizing resin applicator and hand lay-up operations and the associated solvent cleaning operations, identified as the Main Glass Plant Chop Booth, with a maximum capacity to apply 437 pounds of neat resin per hour, using dry filters to control particulate matter emissions, and exhausting to two (2) stacks.

The ledge lamination area consisting of multiple ledge stations, one (1) non-atomizing resin

applicator and hand lay-up operations and the associated solvent cleaning operations with a maximum capacity to apply 437 pounds of neat resin per hour with fugitive emissions.

- (5) One (1) gelcoat booth equipped with one (1) air assisted applicator and the associated solvent cleaning operations, identified as the Main Glass Plant Gel Coat Booth, with a maximum capacity to coat 118 pounds of fiberglass gel coat per hour, using dry filters to control particulate matter emissions, and exhausting to one (1) stack.
- (6) One (1) gel coat booth identified as Research and Development Gel Coat Booth and the associated solvent cleanup operations, using dry filters to control particulate matter emissions, and exhausting to one (1) fan. And one (1) chop booth identified as Research and Development Chop Booth and the associated solvent cleaning operations, using dry filters to control particulate matter emissions and exhausting to one (1) fan.
- (7) Fiberglass truck cap adhesive application, identified as Adhesive Booth C with a maximum usage of 1.0 gallon of adhesive per hour using air-assisted airless spray system, with dry filters to control the particulate matter overspray emissions.
- (8) Aluminum truck cap customized painting operation with a maximum capacity of 1.25 units per hour. This emission unit is equipped with High Volume Low Pressure (HVLP) spray system, with dry filters to control PM overspray emissions.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
- (2) Tonneau cover adhesive application, identified as Adhesive Booth T with a maximum usage of 0.20 gallon per hour, using air-assisted airless spray system.
- (3) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment .
- (4) Paved and unpaved roads and parking lots with public access.
- (5) Other activities of categories not previously identified:

Insignificant Thresholds: Activities with emissions equal to or less than thresholds require listing only

Lead (Pb) = 0.6ton/year or 3.29 lbs/day

Carbon Monoxide (CO) = 25 lbs/day

Sulfur Dioxide (SO₂) = 5 lbs/hour or 25 lbs/day

Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day

Nitrogen Oxides (NO_x) = 5 lbs/hour or 25 lbs/day

Volatile Organic Compounds = 3 lbs/hour or 15 lbs/day

- (a) One (1) combination booth (sanding operations, saw dust collectors)
- (b) Touch up painting
- (c) Waxing of molds
- (d) Twelve (12) hand grinders
- (e) Six (6) water cutters
- (f) Two (2) 6,000 capacity unsaturated polyester resin storage tanks
- (g) Two (2) 300 gallon capacity shear mixing tanks used to mix unsaturated polyester resin and calcium carbonate
- (h) One (1) 1,500 gallon capacity acetone storage tank

- (i) One (1) adhesive application spray area with two (2) stations to apply adhesive to tonneau covers
 - (j) One (1) corrugating station used to hand cut cardboard and fiberglass mat for hand and spray lay-up operations and the bandsaw cutting of aluminum
 - (k) One (1) gelcoat storage and mixing room
 - (l) Less than 90 day storage of hazardous wastes containing VOC's and HAPs in closed containers
 - (m) Metal strip cutting operation
 - (n) Mold repair and maintenance operations
- (6) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000, 000) Btu per hour.
 - (a) One (1) propane-fired shrink wrap heat gun.
- (7) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
 - (a) One (1) 300 gallon capacity diesel fuel storage tank.
- (8) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
 - (a) Air tool maintenance
 - (b) Compressor maintenance
- (9) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
 - (a) One (1) acetone recycling machine
- (10) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (11) Blowdown for any of the following: sight glass; boiler; compressors, pumps and cooling tower
 - (a) Blowdown for compressors
- (12) Grinding and machining operations controlled with filters scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grain per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
 - (a) Tonneau assembly area:
 - (A) Miscellaneous woodworking operations to cut shipping mounting boards
 - (B) One (1) combination grinding booth
 - (b) Main glass plant:
 - (A) One (1) combination grinding booth
 - (B) Miscellaneous woodworking operations to cut shipping mounting boards
 - (c) Paint building - Paint preparation scuff sanding room.
- (13) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).
 - (a) Main glass plant - Mold maintenance activities
- (14) A laboratory as defined in 326 IAC 2-7-1(20)(C)
 - (a) One (1) gelcoat and resin QA/QC laboratory

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (1) One (1) paint/clear coat booth with one (1) air-assisted airless gun for clear coating and one (1) HVLP gun for painting, and the associated solvent cleaning and coating mixing operations, identified as Paint/Clear Booth # 3, with a maximum capacity of 41.4 pounds of VOC per hour, using dry filters to control particulate matter emissions, exhausting to two (2) stacks, with one (1) cure oven exhausting to one (1) stack.
- (2) One (1) paint/clear coat booth with one (1) air-assisted airless gun for clear coating, and the associated solvent cleaning and coating mixing operations, identified as Paint/Clear Booth # 4, with a maximum capacity of 41.4 pounds of VOC per hour, using dry filters to control particulate matter emissions, exhausting to one (1) stack, with one (1) cure oven exhausting to one (1) stack.
- (3) Two (2) spray booths identified as Spray Booth # 1 and Spray Booth # 2 each equipped with one (1) HVLP spray gun for painting, and the associated solvent cleaning and coating mixing operations, each with a maximum capacity 41.4 pounds of VOC per hour, each using dry filters to control particulate matter emissions and each exhausting to one (1) stack.
- (4) One (1) chop booth equipped with one (1) non-atomizing resin applicator and hand lay-up operations and the associated solvent cleaning operations, identified as the Main Glass Plant Chop Booth, with a maximum capacity to apply 437 pounds of neat resin per hour, using dry filters to control particulate matter emissions, and exhausting to two (2) stacks.

The ledge lamination area consisting of multiple ledge stations, one (1) non-atomizing resin applicator and hand lay-up operations and the associated solvent cleaning operations with a maximum capacity to apply 437 pounds of neat resin per hour with fugitive emissions.

- (5) One (1) gelcoat booth equipped with one (1) air assisted applicator and the associated solvent cleaning operations, identified as the Main Glass Plant Gel Coat Booth, with a maximum capacity to coat 118 pounds of fiberglass gel coat per hour, using dry filters to control particulate matter emissions, and exhausting to one (1) stack.
- (6) One (1) gel coat booth identified as Research and Development Gel Coat Booth and the associated solvent cleanup operations, using dry filters to control particulate matter emissions, and exhausting to one (1) fan. And one (1) chop booth identified as Research and Development Chop Booth and the associated solvent cleaning operations, using dry filters to control particulate matter emissions and exhausting to one (1) fan.
- (7) Fiberglass truck cap adhesive application, identified as Adhesive Booth C with a maximum usage of 1.0 gallon of adhesive per hour using air-assisted airless spray system, with dry filters to control the particulate matter overspray emissions.
- (8) Aluminum truck cap customized painting operation with a maximum capacity of 1.25 units per hour. This emission unit is equipped with High Volume Low Pressure (HVLP) spray system, with dry filters to control PM overspray emissions.

INSIGNIFICANT ACTIVITIES:

- (2) Tonneau cover adhesive application, identified as Adhesive Booth T with a maximum usage of 0.20 gallon per hour, using air-assisted airless spray system.
- (5)(a) One (1) combination booth (sanding operations and saw dust collectors)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit of VOCs are less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year, from the equipment covered in this permit, shall require approval from OAQ pursuant to 326 IAC 2-2 and 40 CFR 52.21, before such change may occur.

D.1.2 Volatile Organic Compounds (VOC) Emissions

- (a) Pursuant to OP No. 039-0695-00076, issued on December 31, 1990, the use of gel coats, resins, cleanup solvents, and other materials containing VOCs delivered to the applicators of Spray Booth #1, Main Glass Plant Chop Booth, Main Glass Plant Gel Coat Booth, Research and Development Chop Booth, Research and Development Gel Coat Booth, one (1) adhesive booth and one (1) combination booth are limited, in total, to 14.8 tons per month (177 tons per year).
 - (1) Compliance with the above limits shall be determined based upon the following criteria:
 - (A) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques as approved by IDEM, OAQ for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.
 - (B) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998, or its updates. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent basis.
- (b) Pursuant to the Registration Permit issued on October 25, 1990, the potential VOC emissions for Spray Booth #2 are less than twenty-five (25) tons per twelve (12) consecutive months.
- (c) Pursuant to RP No. 039-2323-00076, issued on January 28, 1992, the potential VOC emissions for Paint/Clear #4 are less than twenty-five 25 tons per twelve (12) consecutive months.
- (d) Pursuant to RP No. 039-3273-00076, issued on November 29, 1993, the potential VOC emissions for Paint/Clear #3 are less than twenty-five 25 tons per twelve (12) consecutive months and Paint/Clear #3 is limited to painting 36 units per day.

- (e) Any change or modification which may increase the potential emissions from Spray Booth #2, Paint/Clear #3, or Paint/Clear #4 to 25 tons per year or more must be approved by the Office of Air Quality before such change may occur.
- (f) The fiberglass truck cap adhesive application has a potential VOC emissions of less than 25 tons per year. Therefore, 326 IAC 8-1-6 (General Reduction Requirements) is not applicable. However, any change or modification which may increase potential VOC emissions to 25 tons per year or more shall be subject to 326 IAC 8-1-6, and must be approved by the Office of Air Quality before such change may occur.

D.1.3 Volatile Organic Compounds [326 IAC 8-2-9]

The aluminum truck cap customized painting operation is capable of painting 30 truck caps per day. Therefore, 326 IAC 8-2-9 (Miscellaneous Metal Coating) is not applicable. Any change or modification to this operation which may increase the truck caps being painted to 35 units per day, shall be subject to 326 IAC 8-2-9, and must be approved by the Office of Air Quality before such change may occur.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) The PM from Spray Booth #1, Spray Booth #2, Paint/Clear #3, and Paint/Clear #4, Main Glass Plant Chop Booth, Main Glass Plant Gel Coat Booth, Research and Development Chop Booth, Research and Development Gel Coat Booth shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to 326 IAC 6-3-2(d), the aluminum truck cap customized painting shall be controlled by a dry particulate filter, waterwash, or an equivalent control subject to the following:
 - (1) The source shall operate the control device in accordance with manufacturer's specification.

D.1.5 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart M] [40 CFR 63.3901]

- (a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart M. The Permittee must comply with these requirements three (3) years after the date of publication of final rule in the Federal Register.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.1.6 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

The provisions of 40 CFR Part 63, Subpart M (National Emission Standards

for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart Mmmm.

- (a) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).
 - (1) All coating operations as defined in 40 CFR 63.3981;
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, and are applicable to the affected source.

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Spray Booth #1, Spray Booth #2, Paint/Clear #3, Paint/Clear #4, Main Glass Plant Gel Coat Booth, Main Glass Plant Chop Booth, Research and Development Chop Booth and Research and Development Gel Coat Booth and any control devices.

Compliance Determination Requirements

D.1.8 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.9 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.10 VOC Emissions

Compliance with Conditions D.1.1 and D.1.2 shall be demonstrated at the end of each month

based on the total volatile organic compound usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.11 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when Spray Booth #1, Spray Booth #2, Paint/Clear #3, Paint/Clear #4, Main Glass Plant Gel Coat Booth, Main Glass Plant Chop Booth, Research and Development Chop Booth and Research and Development Gel Coat Booth are in operation.

D.1.12 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.13 Record Keeping Requirements and Notification under 40 CFR Part 63, Subpart M

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and

- (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.1.8 and D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with Condition D.1.3, the Permittee shall maintain log of the customized aluminum truck caps produced daily.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
- (e) Notification Requirements [40 CFR 63.3910]
 - (1) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).
 - (2) Initial notification. The Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart Mmmm.
 - (3) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

D.1.14 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Minor Source Modification and Minor Permit Modification

Source Background and Description

Source Name:	Truck Accessories Group, dba 20 th Century Fiberglass
Source Location:	1131 D.I. Drive, Elkhart, Indiana 46514
County:	Elkhart
SIC Code:	3089, 3792
Operation Permit No.:	T039-7437-00076
Operation Permit Issuance Date:	January 15, 1999
Minor Source Modification No.:	039-18052
Minor Permit Modification No.:	039-18245
Permit Reviewer:	Aida De Guzman

The Office of Air Quality (OAQ) has reviewed a modification application from Truck Accessories Group, dba 20th Century Fiberglass relating to the following:

- (a) Re-classification of the aluminum truck cap customized painting operation, an insignificant activity into a permitted emission unit with a maximum capacity of 1.25 units per hour. This emission unit is equipped with High Volume Low Pressure (HVLP) spray system, with dry filters to control PM overspray emissions.

History

On October 3, 2003, Truck Accessories Group dba 20th Century Fiberglass submitted an application to the OAQ requesting to increase production to their existing insignificant emission unit. Truck Accessories Group dba 20th Century Fiberglass was issued a Part 70 permit T039-7437-00076 on January 15, 1999.

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification and Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on October 3, 2003. Additional information was received on October 17, 2003.

Emission Calculations

- (a) Aluminum Truck Caps Painting: See Pages 1 and 2 TSD Appendix A of this document for detailed emissions calculations.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	3.16
PM-10	3.16
SO ₂	0.00
VOC	18.09
CO	0.00
NO _x	0.00

HAP's	Potential To Emit (tons/year)
Xylene	3.64
Toluene	0.10
MIBK	0.31
Ethyl Benzene	0.54
MEK	1.39
Worst Case Single HAP	3.64
Combined HAPs	5.98

Justification for Modification

- (a) The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification, pursuant to 326 IAC 2-7-10.5(d), since the volatile organic compound (VOC) potential to emit is greater than 10 tons per year but less than 25 tons per year.
- (b) The Part 70 Operating permit is being modified through a Part 70 Minor Permit Modification, pursuant to 326 IAC 2-7-12(b), since the change does not qualify as significant change to the existing monitoring, reporting and record keeping requirements in the Part 70 permit, and does not qualify as an Administrative Amendment.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	not determined

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Elkhart County has been classified as attainment or unclassifiable for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Source Status

Existing Source PSD or Emission Offset Definition (taken from the issued Part 70 permit 039-7437-00076, since no modification from the source has been made since the Part 70 has been issued):

Pollutant	Emissions (tons/year)
PM	1.79
PM-10	1.79
SO ₂	0.0
VOC	177.0
CO	0.0
NO _x	0.0

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs

Modification of the Aluminum Truck Cap Painting	3.64	3.64	0.00	18.09	0.00	0.00	5.98
PSD Threshold	250	250	250	250	250	250	-
Existing Source PTE	1.79	1.79	0.00	177.00	0.00	0.00	0.00
Source PTE After Modification	5.43	5.43	0.00	195.09	0.00	0.00	0.00

- (a) This modification to an existing minor stationary source is **not** major because the emission increase is less than the PSD threshold. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63)
- (1) 40 CFR Part 63, Subpart M - Surface Coating of Miscellaneous Metal Parts and Products. The aluminum truck cap customized painting operation is subject to this NESHAP, since it is located in a source that is major for hazardous air pollutants (HAPs).

The source shall comply with this NESHAP three (3) years after the date of publication of final rule in the Federal Register.

State Rule Applicability - Entire Source

- (a) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

- (a) 326 IAC 8-2-9 (Miscellaneous Metal Coating)
The aluminum truck cap painting involves customized topcoating of trucks, however, it is exempted from this rule, as the production is less than thirty-five (35) vehicles per day (1.25 vehicle/hr * 24 hrs/day = 30 vehicles/day).

- (b) 326 IAC 8-1-6 (General Reduction Requirements)
The aluminum truck cap painting is not subject to 326 IAC 8-1-6, as the volatile organic compounds (VOC) potential emission of 18.09 tons per year is less than 25 tons per year.
- (c) 326 IAC 6-3-2 (Process Operations)
Pursuant to 326 IAC 6-3-2(d), the aluminum truck cap painting shall be controlled by a dry particulate filter, waterwash, or an equivalent control subject to the following:
 - (1) The source shall operate the control device in accordance with manufacturer's specification.

Since the source is operating under a Part 70 permit, the source is exempt from complying with 326 IAC(d)(2).

Changes to the Part 70 Permit

The Part 70 permit will be modified to incorporate the changes permitted in Minor Source Modification 039-18052 (changes will be **bolded** and deletions are ~~struck through~~ for emphasis):

- (a) Section A.3 Insignificant Activities will be modified to delete the aluminum truck cap painting in this section as follows:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
- (2) Tonneau cover adhesive application, identified as Adhesive Booth T with a maximum usage of 0.20 gallon per hour, using air-assisted airless spray system.
- (3) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment .
- (4) Paved and unpaved roads and parking lots with public access.
- (5) Other activities of categories not previously identified:

Insignificant Thresholds: Activities with emissions equal to or less than thresholds require listing only

Lead (Pb) = 0.6ton/year or 3.29 lbs/day

Carbon Monoxide (CO) = 25 lbs/day

Sulfur Dioxide (SO₂) = 5 lbs/hour or 25 lbs/day

Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day

Nitrogen Oxides (NO_x) = 5 lbs/hour or 25 lbs/day

Volatile Organic Compounds = 3 lbs/hour or 15 lbs/day

- (a) One (1) combination booth (sanding operations, saw dust collectors)
- (b) Touch up painting
- (c) Waxing of molds
- (d) Twelve (12) hand grinders
- (e) Six (6) water cutters
- (f) Two (2) 6,000 capacity unsaturated polyester resin storage tanks
- (g) Two (2) 300 gallon capacity shear mixing tanks used to mix unsaturated polyester resin and calcium carbonate
- (h) One (1) 1,500 gallon capacity acetone storage tank

- (i) One (1) adhesive application spray area with two (2) stations to apply adhesive to tonneau covers
- (j) One (1) corrugating station used to hand cut cardboard and fiberglass mat for hand and spray lay-up operations and the bandsaw cutting of aluminum
- (k) One (1) gelcoat storage and mixing room
- (l) Less than 90 day storage of hazardous wastes containing VOC's and HAPs in closed containers
- (m) Metal strip cutting operation
- (n) Mold repair and maintenance operations
- ~~(o) Aluminum truck cap painting~~

(6) through (14) no changes

- (b) Section A.2 Emission Units and Pollution Control Equipment Summary will be modified to include the aluminum truck cap painting and be numbered (8) as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(1) through (7) no changes

- (8) Aluminum truck cap customized painting operation with a maximum capacity of 1.25 units per hour. This emission unit is equipped with High Volume Low Pressure (HVLV) spray system, with dry filters to control PM overspray emissions.**

- (c) Section D.1 will be modified to incorporate the redesignation of the aluminum truck cap

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(1) through (7) no changes

- (8) Aluminum truck cap customized painting operation with a maximum capacity of 1.25 units per hour. This emission unit is equipped with High Volume Low Pressure (HVLV) spray system, with dry filters to control PM overspray emissions.**

INSIGNIFICANT ACTIVITIES:

- (2) Tonneau cover adhesive application, identified as Adhesive Booth T with a maximum usage of 0.20 gallon per hour, using air-assisted airless spray system.
- (5)(a) One (1) combination booth (sanding operations and saw dust collectors)

D.1.2 Volatile Organic Compounds (VOC) Emissions

(a) through (f) no changes

- (d) Condition D.1.3 will be added as follows. Subsequent conditions will be re-numbered accordingly:

D.1.3 Volatile Organic Compounds [326 IAC 8-2-9]

The aluminum truck cap customized painting operation is capable of painting 30 truck

caps per day. Therefore, 326 IAC 8-2-9 (Miscellaneous Metal Coating) is not applicable. Any change or modification to this operation which may increase the truck caps being painted to 35 units per day, shall be subject to 326 IAC 8-2-9, and must be approved by the Office of Air Quality before such change may occur.

- (e) Existing Condition D.1.3, Particulate Matter will be modified to include the condition for the aluminum truck cap painting and be re-numbered D.1.4:

D.1.3 4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) The PM from Spray Booth #1, Spray Booth #2, Paint/Clear #3, and Paint/Clear #4, Main Glass Plant Chop Booth, Main Glass Plant Gel Coat Booth, Research and Development Chop Booth, Research and Development Gel Coat Booth shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to 326 IAC 6-3-2(d), the aluminum truck cap painting shall be controlled by a dry particulate filter, waterwash, or an equivalent control subject to the following:
- (1) The source shall operate the control device in accordance with manufacturer's specification.

- (f) The requirements for the NESHAP will be incorporated in the TV as follows:

D.1.5 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart M] [40 CFR 63.3901]

- (a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart M. The Permittee must comply with these requirements three (3) years after the date of publication of final rule in the Federal Register.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

National Emission Standards for Hazardous Air Pollutants for Surface Coating of

D.1.6

Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

- (a) The provisions of 40 CFR Part 63, Subpart M (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart M.
- (b) Since the applicable requirements associated with the compliance options are not

included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

- (c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).**

- (1) All coating operations as defined in 40 CFR 63.3981;**
- (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;**
- (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and**
- (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating**

operation.

- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, and are applicable to the affected source.**

- (g) The Record Keeping Requirements will be modified to include record keeping requirements for the aluminum truck cap customized painting, and the notification requirements under the NESHAP:

Subsequent conditions will be re-numbered accordingly.

D.1.10 3Record Keeping Requirements and Notification under 40 CFR Part 63, Subpart M

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.1.8 and D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

- (c) **To document compliance with Condition D.1.3, the Permittee shall maintain log of the customized aluminum truck caps produced daily.**
- (e)(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
- (e) **Notification Requirements [40 CFR 63.3910]**
 - (1) **General.** The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).
 - (2) **Initial notification.** The Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart Mmmm.
 - (3) **Notification of compliance status.** The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached **Part 70 Minor Source Modification No. 039-18052-00076, and Minor Permit Modification 039-18245-00076.**